



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

AUG 31 2015

Lawrence Crabtree
c/o Jennifer Ebert
Attention: Trestle Forest Health Project
Placerville Ranger District
4260 Eight Mile Road
Camino, CA 95709

Subject: Draft Environmental Impact Statement for the Trestle Forest Health Project, Eldorado National Forest, California (CEQ# 20150190)

Dear Mr. Crabtree,

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Trestle Forest Health Project, Eldorado National Forest, California. Our review is pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA recognizes the need to reduce fuel loading in the project area to decrease the threat of large, high-intensity wildfires, and to improve forest ecosystem health and resiliency. We understand that the current conditions in the Eldorado National Forest are extremely vulnerable to fire, largely as a result of past practices that were inconsistent with natural fire regimes, and that this vulnerability is heightened by climate change. We appreciate that reducing sediment from roads through improvements to the Forest Transportation System is also a component of the proposed project, as this should contribute to improvement in aquatic habitats.

EPA has rated all action alternatives in the DEIS as Lack of Objections - LO (see enclosed "Summary of Rating Definitions"). We support the best management practices and resource protection measures included in the project design. We recommend that the FEIS incorporate additional measures and information, as discussed below.

EPA appreciates that the DEIS acknowledges the importance of the Western bumble bee and its sensitivity to pesticides. On June 20, 2014, President Obama issued a memorandum directing Federal departments and agencies to evaluate and use their resources, facilities, and land management responsibilities to expand knowledge of pollinator health and to increase habitat quality and availability. While the DEIS acknowledges impacts to pollinators, such as bumblebees, it is unclear what measures, if any, would be implemented during the initial action to mitigate such impacts. We note that the Forest Service's May 2015 draft "Pollinator-Friendly Best Management Practices for Federal Lands," which was released in response to the President's memorandum, includes best management practices for management actions involving the use of pesticides and prescribed burning. We recommend that the

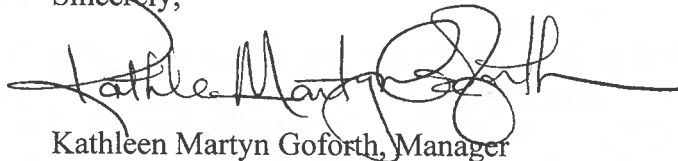
FEIS incorporate those BMPs into the proposed project, as appropriate, to support the health of all pollinators and their affected habitats.

EPA also appreciates that the Forest Service acknowledges in the DEIS that sensitive species will be impacted by climate change. We believe the Council on Environmental Quality's December 2014 revised draft guidance for Federal agencies' consideration of GHG emissions and climate change impacts in NEPA outlines a reasonable approach, and we recommend that the Forest Service use that draft guidance to help outline the framework for its analysis of these issues and, particularly, to inform consideration of measures to adapt to climate change impacts on the project.

The project area may be culturally and spiritually important to Tribes, and Tribal consultation is an important component of the decision-making process associated with the project. We encourage the Forest Service to continue meaningful consultation, throughout the NEPA process, with all potentially affected tribal governments. We recommend that the results of consultations with tribal governments and with the Tribal Historic Preservation Office/State Historic Preservation Office be included in the FEIS.

Thank you for the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Martyn Goforth", with a long horizontal flourish extending to the right.

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment